

1 Michael L. Mallow (State Bar No. 188745)
mmallow@loeb.com
2 Christine M. Reilly (State Bar No. 226388)
creilly@loeb.com
3 Meredith J. Siller (State Bar No. 278293)
msiller@loeb.com
4 LOEB & LOEB LLP
10100 Santa Monica Boulevard, Suite 2200
5 Los Angeles, California 90067-4120
Telephone: (310) 282-2000
6 Facsimile: (310) 282-2200

7 Attorneys for Defendant
Mountain West Research Center, L.C.
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12 Paul Mankin, individually and on behalf
of all others similarly situated,

13 Plaintiff,

14 v.
15

Mountain West Research Center, L.C.,
16 and does 1 through 10, inclusive, and
each of them,

17 Defendants.
18
19
20
21
22
23
24
25
26
27
28

Case No. CV13-06447-DSF (AGR_x)

Assigned to Hon. Dale S. Fischer

**JOINT STIPULATION VACATING
TIME TO RESPOND TO THE
COMPLAINT**

Action Filed on September 3, 2013

Service Waived on September 12, 2013

Filed and Served with [Proposed] Order

STIPULATION

WHEREAS, plaintiff Paul Mankin (“Plaintiff”) and defendant Mountain West Research Center, L.C. (“Defendant”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. Defendant’s response to the Complaint is due by July 1, 2014.
2. Over the last few months, the parties have been negotiating certain changes to the settlement agreement and have now finalized those settlement terms.
3. A draft of Plaintiff’s Motion for Preliminary Approval has been circulated to Defendant. Defendant has reviewed the draft and submitted comments. Plaintiff is now working on finalizing the Motion for submission to the Court.
4. Both lead counsel for Plaintiff are out of the country from June 16 until the end of June.
5. The parties anticipate that Plaintiff will file his Motion for Preliminary Approval by July 18, 2014.
6. The parties agree that filing a response to the Complaint given the pending settlement and Motion related thereto would be a waste of litigant and judicial resources.

THEREFORE, the parties respectfully request that the Court vacate the deadline by which Defendant must respond to the Complaint in light of the pending settlement.

Dated: June 19, 2014

LOEB & LOEB LLP
MICHAEL L. MALLOW
CHRISTINE M. REILLY
MEREDITH J. SILLER

By /s/ Christine Reilly
Christine M. Reilly
Attorneys for Defendant
Mountain West Research Center, L.C.

KRISTENSEN WEISBERG, LLP
JOHN P. KRISTENSEN
DAVID L. WEISBERG

By /s/ John Kristensen
John Kristensen
Attorneys for Plaintiff
Paul Mankin

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28